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2003 DEC -4 P 3:35

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS.

Brimfield Housing Authority, et. al.,

Plaintiffs,

v.

Amerada Hess Corporation, et al.,

Defendants.

Civil Action No. 2003-12399RGS

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO FIRST AMENDED COMPLAINT
(Memorandum Incorporated)

Pursuant to Local Rule 7.1 and Fed. R. Civ. P. 6(b), defendant, CITGO Petroleum Corporation ("CITGO"), respectfully moves this Court for entry of an Order granting an extension of time, on behalf of all Defendants in this action, to answer or move with respect to the First Amended Complaint until the later of (a) January 9, 2004 or (b) ten days after a ruling by this Court as to whether this action was properly removed or will be remanded to state court. As grounds, CITGO states as follows:

1. This is the first motion for extension of time by any of the Defendants.
2. Further, Plaintiffs have indicated that they intend to seek a remand of this case to state court. Counsel for Plaintiffs and Defendants are in agreement that it is more efficient to resolve the motion for remand before Defendants are required to answer or present other defenses and objections to the Complaint. Counsel for Plaintiffs thus have no objection to this motion.

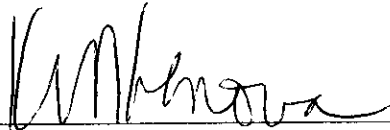
3. Additionally, all Defendants have consented to this motion.

Dated this 4th day of December, 2003.

Respectfully submitted,

CITGO PETROLEUM CORPORATION,

By its attorneys,

A handwritten signature in black ink, appearing to read "J. Owen Todd", is written over a horizontal line.

J. Owen Todd (BBO #499480)

Lisa G. Arrowood (BBO #022330)

Kathleen M. Genova (BBO # 563359)

Todd & Weld LLP

28 State Street, 31st Floor

Boston, MA 02109

(617) 720-2626

OF COUNSEL:

Nathan P. Eimer

Pamela R. Hanebutt

Lisa S. Meyer

Eimer Stahl Klevorn & Solberg, LLP

Suite 1100

224 South Michigan Avenue

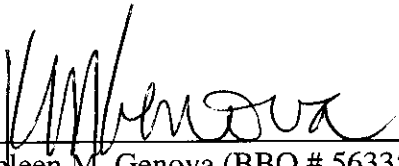
Chicago, IL 60604

(312) 660-7625

(312) 692-1718 (facsimile)

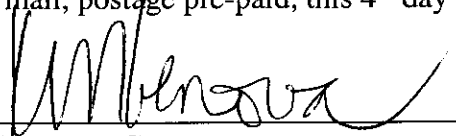
CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I certify that co-counsel for CITGO, Pamela R. Hanebutt of Eimer Stahl Klevorn & Solberg LLP, which firm is CITGO's lead counsel in this matter, has advised me that she conferred with Plaintiffs' counsel, Rene Melancon of Barn & Budd, on December 4, 2003 and that she advised me that Plaintiffs' counsel indicated Plaintiffs do not oppose this Motion.


Kathleen M. Genova (BBO # 563359)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within document was served upon plaintiffs' counsel by federal express and upon all other counsel of record by sending copies of the same to them by first-class mail, postage pre-paid, this 4th day of December, 2003.


Kathleen M. Genova